

III. REMARKS

1. Claims 1, 6 and 11 are amended.
2. Claims 1, 4-6, 9-11 and 14-16 are patentable under 35 U.S.C. 102(e) over Sun, U.S. Pub. No. 2003/0153349. Claim 1 recites a "bendable keymat" including "a plurality of pressure transmitters extending from an interior surface of the keymat", "a substrate located within the cover comprising a plurality of key switches" and a cover including "a plurality of apertures through which the plurality of pressure transmitters pass to activate the plurality of key switches". Sun fails to disclose or suggest these features.

Sun discloses a mobile phone with replaceable key modules (Abstract, L. 1). Each of the key modules (120, 120a, 120b) includes a second connector (121), a second printed circuit board (122), a slot (123) and two protrusions (124). As shown in Fig. 4 of Sun, the second connector (121) corresponds to the first connector (111) of the body (110). The second printed circuit board (122) is electrically coupled to the second connector (121), and the slot (123) corresponds to the engaging member (113) of the body (110). (Para. [0029]).

Nowhere does Sun disclose or suggest that the key modules (120, 120a, 120b) are bendable or that the key modules include a plurality of pressure transmitters as recited in claim 1. In Sun the key modules include a cover (1261) and a base (1262). Located within the cover (1261) and base (1262) are the second printed circuit board (122) a backlight (129) a key assembly (1260). (Para. [0033]; Fig. 5). Sun merely recites that the second printed circuit board (122) includes a plurality of metal pads (128) that correspond to the keys (127) of the key assembly (1260) (Para. [0030]). Sun simply does not disclose pressure transmitters as recited in claim 1. Further, the key modules (120, 120a, 120b) of sun are rigid and are not bendable as recited in claim 1. This is evidenced by the slot (123) in the base (1262). In Sun the key module (120, 120a, 120b) is inserted into the body (110). During the insertion the tab on the engaging member (113) passes through the slot (123) to allow the key module (120, 120a, 120b)

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to sit within the body (110) (See e.g. Figs. 4a-4c). The engagement member (113) is then moved leftward and rightward so that the tab of the engagement member engages the locking portion of the slot (123) (Para. [0028]). Thus, claim 1 is patentable at least for this reason.

Furthermore, Sun does not disclose or suggest a cover including "a plurality of apertures through which the plurality of pressure transmitters pass to activate the plurality of key switches" as recited in claim 1. In Sun the only interaction between the key modules (120, 120a, 120b) and the body (110) is through the slot (123), the lips (124) and the electrical contact (111). There are simply no "apertures" in the body (110) through which "a plurality of pressure transmitters pass to activate a plurality of key switches". Therefore, claim 1 is patentable for this additional reason.

Moreover, Sun does not disclose or suggest "a substrate located within the cover comprising a plurality of key switches". The cover (1261) and/or base (1262) of Sun are not a "cover" as recited in claim 1. The cover (1261) and base (1262) in Sun are part of the key modules (120, 120a, 120b) not the body (110) of the mobile phone (100). The key assembly (1260) of Sun is located within key module itself (Para. [0033]). Signals pertaining to the activation of the keys in Sun are transmitted to the body (110) of the mobile phone (100) through the electrical contacts (111, 121). Thus, Sun does not disclose or suggest "a substrate located within the cover comprising a plurality of key switches" as recited in claim 1.

Therefore, claim 1 is not anticipated and is patentable because Sun fails to disclose or suggest all the features of claim 1. Claims 6 and 11 are patentable for reasons similar to those described above with respect to claim 1. Claims 4, 5, 9, 10, 14 and 15 are patentable at least by reason of their respective dependencies.

Moreover, claim 4 recites that the keymat comprises one or more guiding recesses, and said cover comprises one or more corresponding guide pieces. The Examiner argues that the slot (123) of Sun is the guiding recess and that the engaging member (113) is

the corresponding guide piece. To the contrary, the slot (123) and engaging member (113) of Sun do not guide anything. Paragraph [0032], lines 7-10 of Sun recite "the key module 120, 120a, 120b is fixedly disposed on the body 110 by the engaging member 113 engaging with the slot 123 and the protrusions 124 inserting into the holes 114". In Sun the slot (123) and engaging member (113) are disclosed as fixing the key module (120, 120a, 120b) to the body (110) and nothing more. Thus, claim 4 is not anticipated and is patentable. This argument applies equally to claims 5, 9, 10, 14 and 15.

3. Claims 2, 3, 7, 8, 12 and 13 are patentable under 35 U.S.C. 103(a) over Sun and Kfouri et al., U.S. Pub. No. 2003/0119543 ("Kfouri"). Claims 2, 3, 7, 8, 12 and 13 depend from claims 1, 6, and 11. For the reasons described above, Sun fails to disclose or suggest all the features of claims 1, 6 and 11. It is submitted that the combination of Sun and Kfouri also fails to disclose or suggest all the features of claims 1, 6 and 11.

Kfouri discloses a portable communication device with an interchangeable user input module. The user input module has two input devices, each disposed on one side of the module. (Abstract, L. 1-5). The communication device (400) and input module (200) of Kfouri are similar to that of Sun in that the communication device (400) does not have any "apertures" for "pressure transmitters" to pass. The input module (200) of Kfouri includes the keypads (222, 228), dome panels (210, 216), circuit board (202) which are enclosed within the covers (238, 244) (See. e.g. Fig. 2; Para. [0023] – [0031]). Input signals from the input module (200) as passed to the communication device (400) through the contact pad (208) of the input module (200) and the receptacle (107) of the communication device (400). The input module (200) is also rigid and cannot be bent as evidenced by the sliding engagement between the input module (200) and the communication device (400). Thus, for reasons similar to those mentioned above with respect to Sun, Kfouri fails to disclose or suggest all the features of claims 1, 6 and 11.

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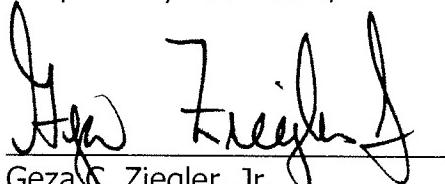
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Therefore, claims 1, 6 and 11 are patentable over the combination of Sun and Kfouri. Claims 2, 3, 7, 8, 12 and 13 are patentable at least by reason of their respective dependencies.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,



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